

**THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**Samir Banerjee,**

**Plaintiff,**

**v.**

**Anadarko Petroleum Corp. and  
Occidental Petroleum Corp.,**

**Defendants.**

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**Civil Action No. 4:21-cv-1515**

**DEFENDANTS' DESIGNATION OF EXPERT WITNESSES**

Defendants Anadarko Petroleum Corp. and Occidental Petroleum Corp. (collectively "Defendants") submit the following Designation of Expert Witnesses.

This designation reflects the experts that, at this time, Defendants expect to call in the trial of the above-referenced case or by affidavit in post-trial motions/briefing. Defendants reserve the right to supplement this designation if additional facts become available. Defendants also reserve the right for any of their designated experts to supplement, amend, or modify their opinion in this case as additional discovery, information, and/or documentation is made available or compiled. Defendants incorporate and designate any expert that Plaintiff may designate in this case.

- (1) **M. Carter Crow**  
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Mr. Crow is an attorney who may testify regarding the reasonable and necessary attorneys' fees the parties have incurred in this case, and he may rebut the testimony of Plaintiff's expert on

this subject. He may offer opinions consistent with his education, training, and expertise, and his testimony may be based on his review of any records relevant to Plaintiff's claims for attorneys' fees. Mr. Crow's biography is attached hereto as Exhibit A.

(2)     **Shauna Johnson Clark**  
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Ms. Clark is an attorney who may testify regarding the reasonable and necessary attorneys' fees the parties have incurred in this case, and she may rebut the testimony of Plaintiff's expert on this subject. She may offer opinions consistent with her education, training, and expertise, and her testimony may be based on her review of any records relevant to Plaintiff's claims for attorneys' fees. Ms. Clark's biography is attached hereto as Exhibit B.

Dated: April 15, 2022

Respectfully submitted,

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*Attorney in Charge for Defendants*

**CERTIFICATE OF SERVICE**

This pleading was served on the following opposing counsel via the Court's CM/ECF service in compliance with Rule 5 of the Federal Rules of Civil Procedure on April 15, 2022.

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